
IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

MACLAREN EUROPE LIMITED,

Plaintiff,

Index No.: 11-cv-4688 (HB)

-against-

ACE AMERICAN INSURANCE COMPANY,
a/k/a ACE USA,

Defendant.

DECLARATION OF ROBERTA NAPOLITANO, ESQ.

ROBERTA NAPOLITANO, ESQ. pursuant to 28 U.S.C. § 1746(2), declares under penalty of perjury that the following is true:

1. I am an attorney licensed to practice before the courts of Connecticut, and am in good standing before the Connecticut Bar.

2. On December 29, 2011, American Baby Products, Inc. (a/k/a Maclaren USA, Inc.) ("MUSA") filed a petition under Chapter 7, Title 11 of the United States Bankruptcy Code, and I was appointed to serve as Trustee of the Estate.

3. In my capacity as the Trustee of the Estate, I have received Subpoenas Duces Tecum served by ACE American Insurance Company ("ACE").

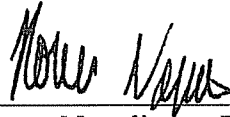
4. By email dated May 9, 2012, from Douglas S. Skalka of Neubert, Pepe & Monteith, P.C., bankruptcy counsel for MUSA, I was advised that there were thirty-five boxes of documents of MUSA's records that remained to be turned over to me as the Trustee of the Estate.

5. I reviewed the documents contained in those boxes, and on June 8, 2012, produced documents to ACE which were responsive to its Subpoenas.

6. Included in the documents that were produced to ACE, which was located with MUSA's documents, was a Cancellation Notice dated June 27, 2006, preceded by a cover page titled "International Advantage Commercial Insurance Policy Endorsements," and a page of defined terms. On the cover page it appears to be written: "7/5/06 Phone Rana – He's taking care of this. Firm." A true and correct copy of the four pages is attached hereto as Exhibit 1.

So Sworn this 13th day of June, 2012

I declare under penalty of perjury that the foregoing
is true and correct.



Roberta Napolitano, Esq

Exhibit 1



ace usa

1/3/06
Phua Pansa
- H.R. Takang case
of this firm

International Advantage

Commercial Insurance Policy Endorsements

INTRODUCTION

This(ese) are your commercial insurance policy endorsements. They modify your coverage, please read them carefully. They may also add coverages to your existing policy.

You, Your, We, Us, and Our

Throughout the policy and applicable endorsements, the terms "you" and "your" mean the person, people, or organization shown as the Named Insured in the Declarations. "We," "us," and "our" mean the insurance company issuing this policy. Besides you, there may be other people "insured" under certain parts of the policy.

Word in Quotation Marks

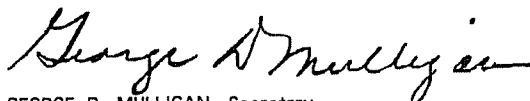
Words and phrases that appear in quotation marks have the special meaning given to them in the Section - DEFINITIONS of the coverage form in which they appear.

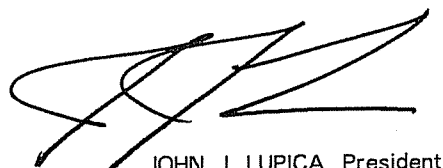
Insured

The word "insured" means any person or organization qualifying as such under the WHO IS AN INSURED sections of the coverage form in which they appear.

By signing and delivering the endorsement(s) to you, we state that it is a valid contract when counter-signed by our authorized representative.

ACE AMERICAN INSURANCE COMPANY


GEORGE D. MULLIGAN, Secretary


JOHN J. LUPICA, President



ace usa

CANCELLATION NOTICE

ACE AMERICAN INSURANCE COMPANY

You are notified that we are herewith cancelling your policy indicated below, in accordance with its terms, and all liability thereunder will terminate, effective as stated below. Unearned premium, if any (if not tendered), will be refunded on demand.

Policy Number: PHFD36824268

Prepared by the ACE office located:

1 BEAVER VALLEY ROAD
WILMINGTON, DE 19803

Policy Term: 04/10/06 TO 04/10/07

Contact telephone number: 800.204.0518

Effective date of Cancellation: July 10, 2006

Notice is null and void if payment is received by effective date.

Cancelled location if different from insured's address:

INSURED NAME AND ADDRESS:

Maclaren Europe Limited & Maclaren Hong Kong Limi

4 Testa Place
Nowalk, CT 06854

PRODUCER NAME AND ADDRESS:

Program Brokerage

1065 Ave of the America
New York, NY 10018

MORTGAGEE OR LOSS PAYEE:

MORTGAGEE OR LOSS PAYEE:

RETURN PREMIUM: \$

CANCELLATION BASIS: PRO RATA

CANCELLATION FACTOR:

0.751

DUE TO NON PAYMENT

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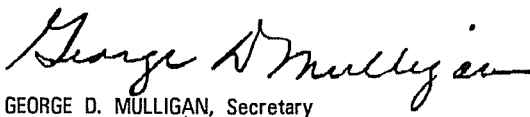
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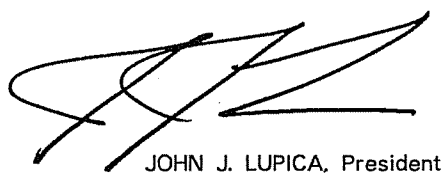
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